



Brief: III 12

Session Dates: 20 July - 24 July 2026

OVERVIEW

The IMO Sub-Committee on Implementation of IMO Instruments (III) held its 12th session from 20 to 24 July 2026. During the session, the Sub-Committee launched a revision of the ISM Code implementation Guidelines, with completion targeted for 2028. It also agreed a remote survey eligibility coding system for the Harmonized System of Survey and Certification (HSSC) Guidelines, confirmed enhanced provisions for Pilot Transfer Arrangement mandatory from 1 January 2028, and advanced the development of new guidance for Port State Control inspection on machinery and maintenance.

This Brief provides an overview of the more significant issues progressed at this session.

KEY TAKEAWAYS

1. **ISM Code overhaul launched** - A Correspondence Group has been established with a roadmap to develop draft amendments for Ill 13 (Summer 2027). The scope for 2028 includes safety culture, harassment prevention, fatigue management, Management of Change, digital Safety Management Systems, and data-driven safety measurement.
2. **Machinery and maintenance in Port State Control crosshairs** - The number of maintenance-related detentions has nearly doubled. New detailed inspection guidance has been proposed but requires further development before inclusion as a Port State Control Procedures appendix. A Correspondence Group has been established to progress the work.
3. **Remote survey coding agreed** - A line-by-line Y/N/C coding approach was adopted for every survey item in the Harmonized System of Survey and Certification (HSSC) Guidelines, with clarification text for all three codes to be developed at a later stage.
4. **Pilot transfer arrangements survey provisions** - More detailed provisions of survey items were agreed, covering strongpoints, manropes, type-approval certification, maintenance records, crew familiarization, and means of communication; mandatory from 1 January 2028.
5. **New safety outputs advancing to the Maritime Safety Committee** - self-unloading bulk carrier fire safety and inflatable lifejacket doffing and deflation instructions to be considered by MSC 112 in December 2026.
6. **Tanker operators: CO₂ monitoring issue remains unresolved** - the Sub-Committee rejected the proposed unified interpretation as it is not in line with the Committees' method of work for non-mandatory resolutions. Interested parties are invited to submit proposals for a new output to revise Resolution MSC.581(110) directly. Tanker operators should continue to ensure that their enclosed space entry procedures clearly document the relevant hazards based on a risk assessment.

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DEVELOPMENT OF SURVEY GUIDANCE

Updated Survey Guidelines under the Harmonized System of Survey and Certification (HSSC)

The Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) are updated biennially to reflect amendments to relevant mandatory IMO instruments. Although not mandatory under IMO, they are mandatory for all EU Recognized Organizations under EU Regulation (EC) 391/2009. The 2025 HSSC Guidelines (Resolution A.1207(34)) took effect on 1 January 2026.

Remote Survey Eligibility Coding

The Sub-Committee agreed to adopt an **item-level (line-by-line)** coding approach as the basis for future development, incorporating a new column in the Survey Guidelines to indicate the eligibility of remote surveys for each item. A new “Y/N/C” system will be embedded across the HSSC:

Code	Definition	Meaning
Y	Eligible	Item may be surveyed remotely, subject to risk assessment and flag Administration approval
C	Conditionally eligible	Item may be surveyed remotely only if previously physically examined by an approved service supplier within the survey window
N	Not eligible	Item requires physical attendance

Plan approvals and document reviews that form part of initial surveys have been coded as “Y” since these activities are remote by their nature; however, this does not make the overall initial survey eligible for remote conduct. Clarification text for all three codes (“Y”, “N”, and “C”) will be developed by the Correspondence Group for inclusion in the Guidelines, without reopening the agreed coding assignments. Remote surveys cannot be used for the same survey item in two consecutive years, and initial and renewal surveys are not eligible by default.

New Survey Items

The Sub-Committee also incorporated survey items deriving from new mandatory requirements:

What	When	Impact on Ship
Pilot transfer arrangements (new mandatory Performance Standards (MSC.576(110)))	1 Jan 2028	Detailed inspections of design, construction, and installation. Surveyors must check strongpoints, pilot ladders, manropes, trapdoor arrangements, means of securing at intermediate lengths, type-approval certification validity, maintenance plans, records of replacement, crew familiarization records, and means of communication for the responsible officer. Affects every ship embarking pilots.
Lifting appliances and anchor handling winches	In force	Load test records, thorough examination records, operational testing records, and operation/maintenance manuals must be verified and be available on board.
Ro-ro passenger ship fire safety -weather decks	In force	New fire detection and suppression items ships carrying vehicles on weather decks.
PFOS ban	In force	Confirm no extinguishing media contains perfluorooctane sulfonic acid (PFOS). Pre-2026 ships must verify its removal.
Emergency towing (non-tankers ≥ 20,000 gt)	1 Jan 2028	New survey items for emergency towing arrangements on ships other than tankers.

Note: For pilot transfer arrangements, the Sub-Committee agreed to include the more detailed provisions, which will require surveyors to check strongpoints, manropes, means of securing pilot ladders, type-approval certification validity, maintenance plans and records, crew familiarization records, and means of communication for the responsible officer.

Other Developments

- **Hong Kong Convention:** The re-established Correspondence Group was tasked with developing survey guidelines for the Hong Kong Convention, using Resolution MEPC.222(64) as a basis, for incorporation into the HSSC Guidelines
- **Certificates and documents list:** The list of certificates and documents required to be carried on board ships was updated to include the Maritime Autonomous Surface Ships (MASS) Safety Certificate (based on Resolution MSC.595(111)) and the Guidelines on carriage and use of electronic nautical publications (MSC.1/Circ.1705). This will be forwarded for concurrent approval by MEPC 85, MSC 112, LEG 114, and FAL 51, accordingly (expected to be finalized by Fall 2027).
- **Transfer of ships between States:** Draft amendments to MSC/Circ.1140–MEPC/Circ.424 were finalized to establish a notification mechanism for ships de-registered for reasons of non-compliance and no new flag State identified at the time of the de-registration. A proposed requirement for States to also notify IMO when refusing to register a ship due to its failure to meet international rules was debated. However, the provision was ultimately removed from the draft text after consensus could not be reached on the intent and implementation. The draft circular will be submitted for concurrent approval by MEPC 85 and MSC 112 (both scheduled for December 2026).
- **Safe Return to Port (SRtP):** The re-established Correspondence Group will consider whether amendments to the Survey Guidelines are needed in the context of the revised Explanatory Notes (MSC.1/Circ.1369/Rev.1) to ensure harmonized and uniform implementation.
- **Lifting appliances (SOLAS regulation II-1/3-13):** It was concluded that no amendments to the Survey Guidelines are necessary in relation to the adequate stowage and securing of anchors.

Next steps: An intersessional Correspondence Group, coordinated by India, has been established to continue developing the amendments to the Survey Guidelines (deriving from instruments entering into force up to 31 December 2027). The Group was also tasked with further developing the remote survey coding clarifications, and the Hong Kong Convention survey guidelines. The group will report back with a view to finalization at III 13 (Summer 2027) and submission in a consolidated form for adoption at Assembly 35 (December 2027), effective 1 January 2028.

Proposed Preliminary Action for Industry Stakeholders:



Review fleet survey schedules for 2027–2028 to identify remote survey opportunities. **Ensure** pilot ladder type-approval certificates, maintenance plans, and rigging crew familiarization records are complete. **Verify** lifting appliance and anchor handling winch documentation is on board. **Confirm** any PFOS-containing extinguishing media has been removed.

Non-exhaustive list of obligations under instruments relevant to the III Code (resolution A.1208(34))

The Sub-Committee agreed to draft amendments to the 2025 Non-exhaustive List of Obligations (Resolution A.1208(34)) covering instruments entering into force up to 1 July 2028. These include new flag State obligations under the NOx Technical Code - in particular the application of a rational emission control strategy and not-to-exceed emission values - as well as obligations arising from the new Performance Standards for pilot transfer arrangements (MSC.576(110)), including type approval and manufacturer quality system auditing. A comprehensive review of the list's structure has been deferred, and the existing format will be maintained until the review is complete. The Sub-Committee agreed to re-establish a Correspondence Group which was tasked with developing a simple data management tool, such as a spreadsheet, to improve the usability of the list.

Comprehensive revision of the guidelines on the implementation of the ISM Code by Administrations and companies

The 110th Maritime Safety Committee (MSC 110) instructed the Sub-Committees on Implementation of IMO Instruments (III) and on the Human Element, Training and Watchkeeping (HTW) to comprehensively revise the ISM Code implementation Guidelines - both for Administrations (Resolution A.1188(33)) and for Companies (MSC-MEPC.7/Circ.8) - targeting completion in **2028**. The ISM Code itself is not being amended; rather, the Guidelines for its implementation are undergoing revision. The revision responds to an independent expert study conducted between 2023 and 2024 that identified systemic gaps in Safety Management System (SMS) implementation and

was further reinforced by the United States National Transportation Safety Board's (NTSB) investigation on the MV DALI casualty.

Key themes under consideration:

Theme	What it means
Safety Management System (SMS) Usability	Documentation should be practical, proportionate, and aligned with actual shipboard tasks. Auditors will challenge procedures that exist solely to satisfy external expectations.
Designated Person role	Stronger accountability for safety culture, proactive risk management, and ensuring adequate resources. Direct access to the highest level of management is expected to be required without qualification.
Management of Change	A formal requirement may be introduced: before implementing significant operational, organizational, or technological changes, companies would need to identify hazards and manage risks through a structured process.
Digital Safety Management Systems (SMS)	Administrations may be expected to recognize digital Safety Management Systems. A formal framework has been proposed covering definitions, construction standards, and audit guidance.
Audit flexibility	Limited flexibility may be introduced for internal audit intervals and corrective action timeframes - helpful for operators with difficult trading patterns.
Predictive safety management	Safety Management System effectiveness may need to be assessed using objective, data-driven safety performance indicators, rather than only compliance checklists.
Human element	Harassment and violence prevention, fatigue management, the master's authority to escalate non-compliance, and formal complaint procedures are all expected to be addressed.

Next Steps: A Correspondence Group has been established with a roadmap to develop draft amendments for III 13 (Summer 2027). The HTW Sub-Committee Watchkeeping will address fatigue and crewing in parallel.

Proposed Preliminary Action for Industry Stakeholders:



Benchmark your SMS. Priority areas are: Usability, Designated Person responsibilities, Management of Change processes, and Harassment Prevention Policies. **Consider** whether your SMS includes measurable safety performance indicators. If you operate a **digital SMS**, document its capabilities.

HARMONIZATION OF PSC ACTIVITIES WORLDWIDE

Guidelines and Procedures for PSC

Machinery and maintenance

Machinery and electrical failures constitute a significant cause of marine casualties, and deficiencies relating to inadequate maintenance have increasingly resulted in ship detentions. Moreover, existing Procedures for Port State Control, 2025 (A.1206(34)) provide only general principles, and more detailed guidance would promote greater consistency in the conduct of inspections by Port State Control Officers (PSCOs).

The data driving this:

Source	Finding
Tokyo Memorandum of Understanding (Tokyo MoU)	Maintenance detentions nearly doubled from 725 in 2022 to 1,334 in 2023, reversing a ten-year downward trend
Allianz Global Corporate & Specialty (AGCS)	Machinery damage or failure accounted for 1,860 incidents in 2024, which is well over half of all shipping incidents globally
Australian Maritime Safety Authority (AMSA)	Maintenance-related issues do not always receive the attention they deserve, as these are often difficult to detect and can be regarded as entirely technical matters, unrelated to safety and pollution prevention

During this session, new detailed inspection guidance was proposed to offer PSCOs a standardized methodology for in-depth machinery checks. The proposed guidelines cover the overall condition of machinery spaces, main engine alarm systems, component maintenance and starting systems, power generation, electrical systems, steering gears, boilers, Unmanned Machinery Space (UMS) requirements, and Planned Maintenance System (PMS) verification. Following in-depth discussions, it was agreed that the draft guidelines needed further review to ensure consistency with SOLAS 1974 requirements, to avoid overly prescriptive testing regimes, and to clearly distinguish between operational guidance and training material. Consequently, the work will continue intersessionally, through the establishment of a Correspondence Group (CG).

Next steps: A Correspondence Group has been established to further consider both Port State Control Officer qualifications and the development of the enhanced machinery and maintenance inspection guidelines. The group will report back with a view to finalizing the guidance at III 13 (Summer 2027).

*Note: The **Paris/Tokyo Memorandum of Understanding Concentrated Inspection Campaign on Cargo Securing** runs **September–November 2026**.*

Proposed Preliminary Action for Industry Stakeholders:



Review PMS effectiveness immediately. **Verify** that controlled blackout test procedures are included in your SMS and regularly conducted. **Review** fleet procedures against newly referenced instruments, particularly SEEMP, CII, and fuel consumption records. **Ensure** ballast water records and biofouling management plans are current. **Prepare** for the Cargo Securing Concentrated Inspection Campaign before September 2026. Charterers should factor underperforming flag State detention risk into fixture decisions.

ANALYSIS OF MARINE SAFETY INVESTIGATION REPORTS

Analysis of Marine Casualty Reports and Lessons Learned

The Sub-Committee received the report of the intersessional correspondence group, which compiled and reviewed 70 cases of Lessons Learned from marine casualties, ultimately approving 63 cases for dissemination. Analysis of the cases identified several recurring contributory factors, including management-related issues, planning and procedures, safety assessments, maintenance, and anthropometric or personal factors. To enhance awareness, the IMO Secretariat was requested to distribute selected cases via new visual representations on social media platforms.

Analysis of incidents of ruptured high-pressure cylinders

Following the review of 21 incidents involving ruptured high-pressure cylinders, the Sub-Committee identified corrosion as the leading contributing factor to the failures, followed by overpressure and other causes. Moreover, recurring deficiencies were identified in onboard and external inspections, as well as poor record-keeping, alongside the significant impact of cylinder age (including units that were expired, overdue for testing, or untraceable). The Sub-Committee approved this analysis to be disseminated to the maritime industry through an III.3 circular.

Lessons learned for improving the proper operation and effectiveness of BNWAS

A document presenting safety issues identified during the investigation into the collision between the container ship **Sitc Danang** and the fishing vessel **Yue Nan Ao Yu 36062** with respect to the improper use of the Bridge Navigational Watch Alarm System (BNWAS) was considered during this session. The investigation highlighted that the BNWAS was either not activated or improperly configured, identifying a key safety issue in the lack of traceability for the system's operational status under current IMO performance standards (resolution MSC.128(75)), which only require recording alarms rather than the "on/off" status.

During the discussions, some delegations noted that newer Voyage Data Recorders (VDRs) already record BNWAS status at 30-second intervals and argued that the root cause was primarily human factors and procedural compliance rather than technical deficiencies. Following in-depth discussion, the Sub-Committee agreed to instruct the Correspondence Group to further analyze the incident and the potential need to review the scope of existing BNWAS performance standards.

Bulk Carrier Casualty statistics

The Sub-Committee considered the [Bulk Carrier Casualty Report for 2016-2025](#), noting that cargo liquefaction remains the greatest contributor to loss of life, while grounding remains the greatest cause of ship losses.

New outputs

The Sub-Committee considered two draft proposals for new outputs:

- The installation of fixed fire suppression systems in cargo spaces of specialized self-unloading bulk carriers. The proposal originates from an Australian Transport Safety Bureau (ATSB) investigation into fires on such vessels.
- Amendments to the LSA Code and Model Regulations on Domestic Ferry Safety (resolution MSC.518(105)) to address risks associated with wearing inflatable lifejackets, which relates to the 2022 capsizing of the I-Catcher where inflated lifejackets hindered victims' escape from an air pocket underneath the upturned hull.

The Sub-Committee agreed to invite MSC 112 (December 2026) to agree to both draft new outputs.

Next Steps: The Sub-Committee agreed to re-establish the Correspondence Group on Casualty Investigation, to continue the analysis of marine safety investigation reports and its work on identified safety issues intersessionally. Additionally, the IMO Secretariat will publish the 63 Lessons Learned in the form of an III.3 circular and promote selected cases using visual representations across social media.

Review of the Casualty Investigation Code and the associated Implementation Guidelines (Resolution A.1075(28))

The Sub-Committee considered the comprehensive review of the Casualty Investigation Code (CIC) and its associated implementation Guidelines (resolution A.1075(28)), with a targeted completion year of 2028. The scope of the review is mainly focused on improving the quality and timeliness of marine safety investigations and reports. It was emphasized that the fundamental objective of the CIC—preventing future casualties rather than apportioning blame or determining liability—must be preserved.

To ensure an efficient and accurate review of the CIC and the associated Guidelines, the Sub-Committee decided to focus on specific, potentially contentious points to ensure fair representation of views throughout the review work. Key topics of discussion included the potential mandating of certain investigation principles, addressing timeliness and administrative reporting burdens, the Code's applicability to non-SOLAS ships, clarifying definitions such as Very Serious Marine Casualty (VSMC), balancing judicial and investigative powers, and the standardization of notification formats.

Next Steps: The Sub-Committee agreed to re-establish the Correspondence Group on Casualty Investigation, to continue the review of the Code and its associated Guidelines (resolution A.1075(28)) intersessionally. The group will submit its report to III 13 (Summer 2027).

OTHER DEVELOPMENTS

CO₂ monitoring on tankers

INTERTANKO raised concerns that CO₂ monitoring provisions in Resolution MSC.581(110) on entering enclosed spaces may be interpreted by Port State Control Officers as applicable to all ship types, even though CO₂ is not a characteristic hazard in inerted tanker cargo spaces. The Sub-Committee agreed that developing a unified interpretation of a non-mandatory resolution was not in line with the Committees' method of work. INTERTANKO and interested Member States were instead invited to submit a proposal for a new output to the Maritime Safety Committee to revise the resolution directly. Until any revision is agreed, tanker operators should review their enclosed space entry permits and ensure their risk-based procedures clearly document the hazards relevant to their cargo spaces, and be prepared to explain their approach during Port State Control inspections.

Unified interpretation - "Completion date of the survey"

The revised unified interpretation clarifies that the "based on" date on certificates refers to the date of the last initial or renewal survey and verification visit, resolving longstanding inconsistencies in how certificates are completed.

Maritime Autonomous Surface Ships Safety Certificate

The list of certificates and documents required on board was updated to include the MASS Safety Certificate (Resolution MSC.595(111)). Although currently non-mandatory, its inclusion signals that the regulatory framework for autonomous vessels is being integrated into standard survey and documentation practices.

Port State Control Officer training manual

A revised framework for an entrant training manual for Port State Control Officers was agreed. China will develop the full draft for submission to III 13 (Summer 2027), with an advance copy to all regional Port State Control Memoranda of Understanding.

A large container ship is shown from a high-angle perspective, sailing on a deep blue ocean. The ship's deck is densely packed with multi-colored shipping containers in shades of red, blue, yellow, and green. The ship's white superstructure is visible at the stern. The sun is low on the horizon to the right, casting a warm glow over the scene.

ABS RESOURCES

- [ABS Regulatory News \(link\)](#)
- [ABS Regulatory Lessons \(link\)](#)
- [ABS Safety in Minutes Video Series \(link\)](#)
- [ABS Remote Survey Services \(link\)](#)
- [ABS Port State Control Checklist \(link\)](#)
- [ABS Rules and Guides \(link\)](#)

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